
From: Roger Bernstein <rbernstein@rjblaw.com>
Sent: Thursday, May 19, 2022 4:20 PM
To: Allen, Angela M.
Subject: Javeri Discovery Response

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Angela:

To get discovery moving, here is an informal response to your document demands (without waiver of the objections to be made in a formal response):

Requests 1 and 2: List of bank accounts: Javeri had accounts at Fine Mark (closed 2018) Santander (2019), and Chase, all closed. The Chase statements are available through 12-31-2019. I believe the final Chase statement must be later than that; I will request it. Other accounts have been at HSBC, Wells Fargo, and TD Bank.

Use this link for the Chase, HSBC and Wells Fargo statements:

<https://www.dropbox.com> [REDACTED] password is [REDACTED]

I anticipate adding the TD Bank statements tomorrow.

Request 3 – no balance sheets or financial statements

Request 4 – I have sent you her federal income tax returns for 2019 and 2020; 2021 apparently is not yet done. (These were not numbered but are less than 50 pages; therefore the bank statement numbering starts at 50).

Request 5 – no real property titled to Ami; is a beneficiary of the Ithaca and Deposit trusts

Request 6 – emails with Trident concerning NY real estate have been produced by the LLCs

Request 7 – none

Request 8 – n/a

Request 9 – she will obtain insurance policies

Request 10 – none

Request 11 – n/a

Request 12 – none

Requests 13, 15 and 16: Ithaca Trust & [REDACTED] – all requested information has to come from Trident; Rohin Trust in India – no information or documents available; Daimreum Trust – not believed to have any property.

Request 14 – will review this further, except that the LLCs are producing her emails with Trident

Request 17 – no one owes her money

Request 18 – no loan documents for monies advanced by Diamond Holdings

Requests 19 and 20 – none

RJB

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